

GRANTED. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 20.

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SO ORDERED.



Arun Subramanian, U.S.D.J.

May 12, 2025

Date: May 13, 2025

VIA ECF

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15A
New York, NY 10007
SubramanianNYSDCChambers@nysd.uscourts.gov

Re: Consent Motion to Extend Time to Respond to Complaint
The Shade Store LLC v. Interior Motif Decorating et al. (Case No. 25-cv-2602-AS)

Dear Judge Subramanian:

I am new counsel to defendants in the above-referenced action. My firm was retained as counsel to the Defendants on May 5, 2025 - just one week ago. I am the Lead Trial Counsel for all Defendants.

Plaintiff's counsel filed the Complaint in this Action on March 28, 2025 (the "Complaint"). The Complaint was served on individual defendants Stephan Elbaz and Raquel Assouline's adult daughter at their residence on April 19, 2025. The Answer or other response to the complaint would be due today. The reasons why we did not file this Letter Motion two business days before today's deadline is that we were just retained one week ago, we have been investigating facts, attempting to ascertain whether service was proper, and exploring potential insurance coverage. In a settlement conference call with Plaintiff's counsel on May 7, 2025, I requested that Plaintiff's counsel ask her client whether it would consent to this extension request. Plaintiff's counsel informed me this afternoon that Plaintiff has consented to our extension request.

This letter constitutes a Motion to Extend the time to respond to the Complaint by thirty (30) days. The Parties' counsel have begun to discuss potential settlement of the case and believe that the additional time could facilitate settlement discussions.

No previous requests for adjournment or extensions of time have been made. The only scheduled Court appearance in this case is the Initial Pretrial conference which is currently scheduled for July 1, 2025 at 3:00 p.m.

Dated: May 12, 2025

Respectfully submitted,

By: /Gregory P. Gulia /
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Counsel for all Defendants

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system and all counsel of record who have appeared in this case on behalf of the parties will receive the Court's notification of electronic filing.

/s/ Gregory P. Gulia
Gregory P. Gulia (2562916)